

UNITE RIGGING & HAULING SITE
BELTSVILLE, MD.
CERCLA IMMEDIATE REMOVAL
POLREP #29

*specifically
EEC*

I. SITUATION (7/31/85, 1700HRS.)

A. EPA FUNDING REQUEST WAS SIGNED (7/29/85) TO PROVIDE \$200K FOR TRANSFORMER HANDLING AT THE UNITED RIGGING & HAULING SITE.

B. EPA ENFORCEMENT, OSC, TAT, PEPCO, CHEMICAL WASTE MANAGEMENT AND MCCRONE ENGINEERING ATTENDED A MEETING (7/30/85) REGARDING THE WORK SCHEDULE TO CLEAN-UP THE UNITED RIGGING & HAULING SITE. THE OSC WAS GIVEN THE SITES SPCC PLAN FOR HIS REVIEW AND SIGNATURE.

C. MEDIA INTEREST REMAINS HIGH. RAY GERMANN (EPA OFFICE OF PUBLIC AFFAIRS) WAS ONSITE 7/31/85 TO HANDLE MEDIA INQUIRIES AND TV NEWSCREWS.

II. ACTION TAKEN

A. PEPCO & UNITED RIGGING SIGNED THE CONSENT ORDER FOR THE UNITED RIGGING AND HAULING SITE CLEAN-UP. THE ORDER WAS HAND DELIVERED FOR SIGNATURE TO THE STATE AND EPA REGION III.

B. ERCS PREPARING TO BEGIN FULL-SCALE OPERATIONS 8/1/85.

III. FUTURE PLANS

A. BEGIN DRAINING TRANSFORMERS OWNED BY EEVA.

B. EPA TO CONTINUE TO MONITOR PEPCO CLEAN-UP ACTIVITIES.

C. ERCS ARRANGING FOR DISPOSAL OF PCB OIL AND TRANSFORMER VESSELS.

ROBERT E. CARON, OSC
EPA REGION III, PHILADELPHIA, PA.

DISCONNECTED 02-Aug-85 10:19 03

TLX II 7108229269
CONNECTED 08-Jul-85 13:36 51

SPILLSEPA WSH
EOLREF 29

CERCLA IMMEDIATE REMOVAL PROJECT
UNITED RIGGINGS AND HAULING SITE
PRINCE GEORGES COUNTY
BELTSVILLE, MD.

I) SITUATION: (1400 HRS., 7/8/85)

- A) OSC STILL AWAITING OUTCOME OF CONSENT ORDER NEGOTIATIONS. PEPCO AND UNITED HAVE EXPRESSED A DESIRE TO PERFORM CLEANUP. AS A RESULT OSC'S ADDITIONAL FUNDING REQUEST HAS BEEN HELD UP PENDING FINAL OUTCOME OF RP NEGOTIATIONS. THIS IS DAY 62 OF PROJECT. ACTIVE NEGOTIATIONS FOR RP CONSENT ORDER IS IN EXCESS OF 30 DAYS.
- B) PROJECT CEILING (\$275,000) OFFICIALLY REACHED 7/5/85. OSC NOTIFIED REGIONAL MANAGEMENT OF THIS. ALL EPA WORK HAS CEASED. RP HAS PROVIDED 24 HOUR SECURITY, HOWEVER CONTROL STRUCTURES ARE NOT BEING MONITORED. STATE WILL PERIODICALLY CHECK AS TIME PERMITS. OSC WILL CHECK AS TIME PERMITS, AND IS PREPARED TO RESPOND WITH EMERGENCY AUTHORITIES AS NECESSARY.
- C) OSC INFORMED REGIONAL MANAGEMENT OF SITE STATUS AGAIN EXPRESSING CONCERN OVER SITE STABILITY.
- D) OSC CONSIDERS ENFORCEMENT AND REGIONAL COUNSEL AS LEED AT THIS SITE.

II) ACTIONS TAKEN

- A) OSC CONSULTED WITH REGIONAL COUNSEL THIS DATE. ORDER IS STILL IN NEGOTIATION WITH PRIMARILY LEGAL LANGUAGE CREATING PROBLEMS.
- B) OSC CONTACTED BY PEPCO PROJECT MANAGER AND ARRANGED A MEETING FOR THURSDAY, 7/11/85 ON SITE TO DISCUSS PRELIMINARY CLEANUP BY PEPCO. ENFORCEMENT COMPLIANCE PERSONNEL TO ACCOMPANY OSC TO RECIEVE FIRST HAND LOOK AND BRIEFING SINCE THEY WILL BE PERFORMING ONSITE MONITORING.

III) FUTURE PLANS

- A) OSC TO ARRANGE FOR TRANSFER OF ALL DATA TO RP.
- B) OSC TO MONITOR ON SITE AS REQUESTED OR AS NECESSARY.
- C) OSC TO WORK WITH MDWMA AS REGARDS POSSIBILITY OF BURIED DRUMS.
- D) OSC TO DRAFT FUNDING REQUEST FOR REMOVAL OF 2ND RP (ELECTRICAL EQUIP) IF REGIONAL COUNSEL IS UNSUCCESSFUL IN SECURING RP COOPERATION.

ROBERT E. CARON
ON-SCENE COORDINATOR
USEPA-III
PHILADELPHIA, PA.

DISCONNECTED 08-Jul-85 13:42 18

TLX II 7108229269

CONNECTED 19-Jul-85 10:17 50

SPILLSEPA WSH
POLREP 30

CERCLA IMMEDIATE REMOVAL PROJECT
UNITED RIGGINGS AND HAULING SITE
PRINCE GEORGES COUNTY
BELTSVILLE, MD.

I) SITUATION: (1000HRS., 7/19/85)

A) OSC INFORMED 7/18/85 THAT IT APPEARS LIKELY THAT THE CONSENT ORDER WILL BE SIGNED WEEK OF 7/22, AND THAT ALL INVOLVED PARTIES ARE IN AGREEMENT.

B) STATE OF MARYLAND GRAND JURY CONVENED 7/18 AS REGARDS ALLEGED CRIMINAL ACTIVITY.

C) OSC ISSUED SECOND VERBAL NOTICE TO ELECTRICAL EQUIPMENT CORP. (2ND RP). EEC AGAIN STATED THAT THEY WILL NOT TAKE RESPONSIBILITY FOR THEIR TRANSFORMERS CLAIMING FINANCIAL HARDSHIP. NEITHER PEPCO NOR UNITED WILL REMOVE OR TAKE RESPONSIBILITY FOR THESE TRANSFORMERS.

II) ACTIONS TAKEN

A) OSC INFORMED ERS CHIEF, TOM MASSEY, OF THE ABOVE.

B) OSC CONFERRED WITH REGIONAL COUNSEL AND ENFORCEMENT. OSC HAS DETERMINED THAT THESE TRANSFORMERS MUST BE REMOVED SINCE AT LEAST ONE HAS LEAKED AND NONE HAVE BEEN OR WILL BE PROPERLY MAINTAINED. PCB LEVELS AS HIGH AS 80% HAVE BEEN DETECTED.

C) OSC HAS DRAFTED AN ADDITIONAL FUNDING REQUEST TO REMOVE AND DISPOSE OF THESE ESTIMATED 50 TRANSFORMERS. ESTIMATED TOTAL COST FOR THIS WORK WILL BE \$200,000 OF WHICH \$150,000 WILL BE DISPOSAL.

III) FUTURE PLANS

A) OSC AWAITING APPROVAL OF FUND REQUEST.

B) WORK TO COMMENCE IMMEDIATELY UPON APPROVAL.

C) ASSUMING CONSENT ORDER SIGNED, PEPCO TO BEGIN REMOVAL ACTIONS WEEK OF 7/29.

ROBERT E. CARON
ON-SCENE COORDINATOR
USEPA-III
PHILADELPHIA, PA.

DISCONNECTED 19-Jul-85 10:22 37

SPILLSEPA WSH

POLREP #30

CERCLA IMMEDIATE REMOVAL PROJECT
UNITED RIGGINGS AND HAULING SITE
BELTSVILLE, MD.

I. SITUATION (2000HRS. 8/2/85)

A. CONSENT ORDER AWAITING CONCURRENCE OF RA. PEPCO PREPARED TO START WORK 8/5/85. CHEM WASTE MANAGEMENT IS CONTRACTOR. OSC HAS APPROVED ALL PROPOSED PHASES OF PEPCO/CHEM WASTE WORK PLAN.

B. OSC AND ERCS HAVE BEEN AGGRESSIVELY PURSUING INCINERATION DISPOSAL ALTERNATIVES. IN RESPONSE TO HQ GUIDANCE WHICH REQUIRES A COMPLIANCE CHECK OF ANY PROPOSED DISPOSAL FACILITY PRIOR TO RECEIVING SUPERFUND WASTE, THE FOLLOWING VERY SERIOUS SITUATION HAS BEEN DISCOVERED. OF THE FIVE AVAILABLE PCB INCINERATORS, ONLY ONE IS IN COMPLIANCE AS DETERMINED BY THE GUIDANCE. RECENT RCRA INSPECTIONS WITHIN THE LAST 6 MONTHS HAVE FOUND DEFICIENCIES AT 4 OUT OF 5 FACILITIES. (INTERIM STATUS) CHECKS WITH THE INVOLVED REGIONS ENDED IN REGIONAL RECOMMENDATIONS THAT WASTE NOT GO THERE. THE ONLY IN COMPLIANCE FACILITY IS THE G.E. INCINERATOR IN MASS., BOOKED THROUGH OUT 1986. THEREFOR, THE OSC HAS NO APPROVED DISPOSAL FACILITY FOR THIS WASTE. THIS IS A NATIONWIDE PROBLEM. THE AGENCY DISPOSAL METHOD OF CHOICE (INCINERATION) IS UNAVAILABLE TO THE AGENCY BECAUSE OF AGENCY POLICY AND GUIDANCE. THE OSC IS OF THE OPINION THAT THE NATURE OF THE VIOLATIONS, WHETHER MINOR OR MAJOR, THE FACILITIES RESPONSE TO THE PROBLEM, SHOULD BE WEIGHTED, BY THE AFFECTED REGION THEREBY ALLOWING FOR CONTINUED, DISPOSAL AT THESE FACILITIES CONTINUE TO OPERATE, ACCEPTING AND DISPOSING OF INDUSTRY GENERATED HAZARDOUS WASTE DAILY.

C. THE OSC IS ACTIVELY PRUSUING OTHER OPTIONS SUCH AS ONSITE INCINERATIONS AND STORGAGE. INCINERATION ONSITE IS MOMENTARILY UNFEASABLE. (1.5MILLION). THE OSC IS EMPHATICALLY AGAINST STORING MATERIAL ONSITE SINCE THIS CREATES AN OPERATIONS AND MAINTENANCE HEADACHE, ADDITIONAL COSTS AND DOES NOT BENEFIT THE ENVIRONMENT. OTHER OPTIONS WILL BE PURSUED FOR FINAL DISPOSITION OF THIS HIGH LEVEL PCB FLUID, SUCH AS ONSITE DETOXIFICATION.

D. DUE TO THE ABOVE MENTIONED SITUATION, THE OSC WAS FORCED TO CHANGE SITE SOP FROM A BULKING OPERATION, (TANKER) TO A PER DRUM OPERATION SINCE TOTAL COSTS INCLUDING THE POTENTIAL FOR STORAGE IS LESS FOR THE LATTER. THIS WILL RESULT IN ADDITIONAL COSTS IN DIRECT RESPONSE TO THE UNAVAILABILITY OF DISPOSAL SITES.

E. IT SHOULD BE MENTIONED THAT THIS PRESENT EMERGENCY ACTION HAS BEEN DEEMED NECESSARY BY THE OSC AND THE STATE OF MARYLAND SINCE THESE TRANSFORMERS ARE IN POOR CONDITIONS HAVE LEAKED IN THE PAST AND FOR ALL INTENSIVE PURPOSES CAN BE CONSIDERED ABANDONED. THIS HIGH LEVEL PCB WASTE PRESENTS A THREAT TO THE PUBLIC HEALTH AND THE ENVIRONMENT, VIA DIRECT CONTACT, A STRONG POTENTIAL FOR RELEASE AND FURTHER CONTAMINATION OF AN ALREADY GROSSLY CONTAMINATED SITE.

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SPILLSEPA WSH
345

POLREP 31

CERCLA IMMEDIATE REMOVAL PROJECT
UNITED RIGGINGS AND HAULING SITE
BELTSVILLE, MARYLAND

*does this
refer to EE*

- I. SITUATION (1900HRS. 8/4/85)
- A. TRANSFORMER DRAINING OPERATIONS CONTINUED THROUGH WEEKEND. TOTAL OF 5000 GALLONS.
 - B. FLUSH OPERATIONS USING DIESEL FUEL COMMENCED 8/3/85.
 - C. LABS PERFORMING PCB ANALYSIS WILL NO LONGER DISPOSE OF SAMPLES DUE TO SMALL QUANTITY GENERATOR RULE. THIS WILL RESULT IN ADDITIONAL PROJECT COSTS ESTIMATED AT \$2000. THIS WILL BE COMMON FROM NOW ON.
 - D. MEDIA INTEREST MODERATE.
- II. ACTION TAKEN
- A. OSC TAT AND ERCS SORTED ALL SAMPLES RETURNED FROM LAB, TO BE BULKED AS TO PCB CONTENT FOR FUTURE DISPOSAL.
 - B. PUUMPING AND FLUSH OPERATIONS CONTINUING. HEAT STRESS SLOWING WORK.
- III. FUTURE PLANS
- A. PROCEED WITH RETROFILL FLUSH, LEAVING FLUSHING TRANSFORMERS AT LEAST 18 HOURS.
 - B. CONTINUE TO DEVELOP DISPOSAL OPTIONS. OSC REQUESTING ASSISTANCE AND ADVICE FROM BOTH REGION AND HQ.

ROBERT E. CARON
ON-SCENE COORDINATOR
U.S. EPA III

F. ESTIMATED COSTS TO DATE: (COB 8/2/85)

ERCS \$223,079
TAT \$ 26,610
EPA \$ 7,000
TOTAL \$256,689
PROJECT \$475,000
CEILING

II. ACTIONS TAKEN

A. OSC CONTACTED REGION, ERS MIKE ZICKLER AND SUPERFUND BRANCH CHIEF, TOM VOLTAGGIO AS REGARDS DISPOSAL SITUATION. THEY ARE IN TUNE WITH THE ISSUES AND ARE PURSUING THE FOLLOWING:

- CAN R.P. SEND WASTE TO NON COMPLIANCE FACILITIES?
- PUBLIC PERCEPTION
- INTERPRETATION OF HQ GUIDANCE.
- SEEKING MORE COMPLETE INFO AS REGARDS POTENTIAL DISPOSAL FACILITY COMPLIANCE PROBLEMS.

? which ones

B. OSC CONTACTED HQ ERD, COLLEEN CARRUTHERS AND DISCUSSED SITUATION AND TO SEEK GUIDANCE. AS MENTIONED, PROBLEM IS NATIONWIDE. HQ, TIM FIELDS, HANS CRUMP, CONSULTED. POSSIBLE, JOINTLY WITH REGION I AND HQ THAT THE SLA FACILITY IN CHICAGO COULD BE USED, SINCE THE COMPLIANCE PROBLEM HAS NOT RESULTED IN RCRA ENFORCEMENT ACTION, AND IT APPEARS THAT THE FACILITY COULD BE IN COMPLIANCE SHORTLY IF THIS BECAME A REGION V PRIORITY OSC SEEKS BOTH REGIONAL AND HQ ADVICE AND GUIDANCE.

C. PRESS CONFERENCE HELD ON SCENE 7/31 AND 8/1. PRESS INTEREST HIGH.

D. TRANSFORMER DRAINING MITIATED 8/1/85. TOTAL OF APPROX. 2000 GALLONS DRUMMED TO DATE.

E. TAT IS ACTING SITE SAFETY. MORNING SAFETY MEETING BEING HELD. LEVEL B USED SINCE PCB LEVELS ARE IN EXCESS OF 70%. ACTUAL HOSE HANDLERS (TWO PEOPLE) WEARING B. ALL OTHERS IN LEVEL C.

F. OSC REVIEWED PEPCO WORK PLAN WITH PEPCO PROJECT MANAGER.

G. OSC BRIEFED P.G. COUNTY FIRE DEPT.

III. FUTURE PLANS

A. CONTINUE PUMPING OPERATIONS.

B. BEGIN TRANSFORMER FLUSH OPERATIONS.

C. WORK THRU WEEKEND TO ALLOW FOR PEPCO TO BEGIN WORK ON CONTAMINATED SOILS. TRANSFORMERS ARE STAGED IN HOT ZONE.

D. CONTINUE PURSUING DISPOSAL OPTIONS.

E. OSC AWAITING SIGNED CONSENT ORDER.

ROBERT E. CARON
ON-SCENE COORDINATOR
U.S. EPA-REGION III
PHILADELPHIA, PA.

cc: [illegible]

COMM. 180 01-800-82 12:15 PM
102 11 00036398

UNITED RIGGING & HAULING SITE
CERCLA IMMEDIATE REMOVAL
BELTSVILLE, MD.

I. SITUATION (8/6/85, 1830HRS.)

A. THE CONSENT ORDER RECEIVED FINAL SIGNATURE ON 8/2/85 IN PHILADELPHIA ALLOWING PEPSCO TO COMMENCE THEIR CLEAN-UP OPERATIONS AT UNITED RIGGING & HAULING (UR&H).

B. OSC IS EXTREMELY CONCERNED ABOUT THE LACK OF DISPOSAL FACILITIES IN TOTAL COMPLIANCE WITH EPA GUIDELINES WHERE PCB WASTE STREAMS CAN BE DISPOSED OF FROM THIS SITE.

C. ESTIMATED COSTS (8/5/85)
ERCS-248K, EPA-7.7K, TAT-30K

D. EPA ENFORCEMENT CONTINUES TO PERFORM ONSITE MONITORING OF RP CLEANUP PLANS.

E. EPA OFFICIALS (TIM FARRIS, K. TOMINETSU, R. MUELLER, C. MCWHIRTER, N. ZIMA WERE ONSITE TO INSPECT AND BE BRIEFED ON CLEAN-UP OPERATIONS AT THE UR&H SITE.

F. PEPSCO CONTINUES TO MOBILIZE AND SET-UP FOR THEIR RP CLEAN-UP ACTIVITIES. OSC MET WITH PEPSCO AND CHEMICAL WASTE MANAGEMENT TO COORDINATE CLEAN-UP EFFORTS.

G. OSC BELIEVES THE LACK OF AN IN COMPLIANCE DISPOSAL FACILITY WILL FORCE HIM TO LEAVE DRUMMED PCB TRANSFORMER FLUID AND TRANSFORMER CARCASSES ONSITE WHICH WILL INTERFERE WITH PEPSCO PHASE OF THE CLEAN-UP.

H. EPA AND STATE DETERMINED THAT EMPTIED TRANSFORMERS PROPERTY CLEANED INSIDE AND OUT CAN BE CONSIDERED NON-HAZARDOUS.

I. THE REGION AND HQ BELIEVE EPA CAN REQUIRE A RP INVOLVED IN AN ENFORCEMENT ACTION TO COMPLY WITH EPA DISPOSAL POLICIES CONCERNING COMPLIANCE.

J. PRINCE GEORGES COUNTY CONTINUES TO REVIEW THE PEPSCO SOIL EROSION CONTROL PLAN. OSC AND MDWMA ARE USING EMERGENCY AUTHORITIES TO ALLOW CLEAN-UP TO CONTINUE UNHAMPERED. PEPSCO TO PERSUE PERMIT VIGOROUSLY.

II. ACTIONS TAKEN

A. OSC OBTAINED A PROVISIONAL GENERATOR ID# MDP000001474 FROM MD IN ORDER TO PREPARE FOR SHIPMENT OF PCB CONTAMINANTS IF AN IN COMPLIANCE DISPOSAL FACILITY IS FOUND.

B. ERCS FINISHED DRAINING AND RETROFILLING THE TRANSFORMERS 8/5/85. FLUSH WAS ALLOWED TO SIT A MINIMUM OF 18 HOURS.

III. FUTURE PLANS

A. PREPARE ONSITE WASTES FOR STORAGE WHILE A DISPOSAL IS BEING SOUGHT.

B. EPA ENFORCEMENT TO CONTINUE TO MONITOR PEPSCO CLEAN-UP ACTIVITIES.

C. FINISH DRAINING FLUSH MATERIAL AND DECON THE OUTSIDE OF THE TRANSFORMERS.

D. BUILD LINED CELL FOR THE STORAGE OF WASTES.

BOB CARON, OSC
USEPA REGION III
PHILADELPHIA, PA.

TLX II 7108229269
CONNECTED 09-Aug-85 10:04 01

SPILLSEPA WSH
POLREP 33

CERCLA IMMEDIATE REMOVAL PROJECT
UNITED RIGGINGS AND HAULING SITE
BELTSVILLE, MD.

I) SITUATION: (8/7/85, 1800 HRS.)

A) PEPCO CONTINUES TO MOBILIZE FOR THEIR ROLE IN THE RP CLEANUP. OSC CONTINUES TO COORDINATE WITH THE PEPCO PROJECT MANAGER AS REGARDS ON SITE ACTIVITIES.

B) ESTIMATED COSTS TO DATE: (COB 8/6/85)

ERCS

EPA

TAT

\$251K

\$8K

\$32K

C) PEPCO BEGAN CONSTRUCTION OF THEIR SOIL EROSION CONTROL AND SEDIMENT CONTROL STRUCTURES.

D) TAT CONTINUES TO ACT AS COST AND SAFETY MONITOR IN ADDITION TO THEIR NORMAL TECHNICAL DUTIES.

E) OSC CONTINUES TO SEEK A DISPOSAL FACILITY WHICH IS IN COMPLIANCE WITH ALL EPA COMPLIANCE POLICIES.

II) ACTIONS TAKEN

A) ERCS FINISHED THE DRAINING OF ALL FLUSH FROM THE TRANSFORMERS.

B) ERCS CONSTRUCTED CLAY BERM AROUND DRUM STORAGE AREA.

C) ERCS WIPED DOWN ALL TRANSFORMERS.

III) FUTURE PLANS

A) TRANSPORT AND DISPOSE OF TRANSFORMER CARCASS AND PCB SOLIDS WEEK OF 8/12.

B) STORE DRUMS ON SITE PENDING LOCATION OF AN APPROVED DISPOSAL FACILITY.

ROBERT E. CARON
ON-SCENE COORDINATOR
USEPA-III
PHILADELPHIA, PA.

TLX II 7108229269
CONNECTED 20-Aug-85 08:38 36

SPILLSEPA WSH
POLREP 34

CERCLA IMMEDIATE REMOVAL PROJECT
UNITED RIGGING AND HAULING SITE
BELTSVILLE, MD.

ATTN: TOM MASSEY AND TIM FIELDS

I) SITUATION: (0800HRS., 8/20/85)

A) FINAL ARRANGEMENTS HAVE BEEN MADE TO TRANSPORT AND DISPOSE OF ALL PCB OIL AND CONTAMINATED MATERIALS TO IN COMPLIANCE FACILITIES. IT SHOULD BE NOTED THAT POLICIES REGARDING COMPLIANCE HAVE DIRECTLY IMPACTED PROJECT COSTS BY AS MUCH AS 20%.

B) DISPOSAL LOCATIONS ARE AS FOLLOWS:

-PCB OILS: ENSCO INCINERATOR, EL DORADO, ARKANSAS.

-TRANSFORMER CARCASSES AND OTHER PCB CONTAMINATED SOLIDS: CHEM WASTE MANAGEMENT, MODEL CITY, NEW YORK.

C) OSC ANTICIPATES APPROACHING CEILING. IN LIGHT OF PRESENT POLICIES REQUIRING INCLUSION OF INDIRECT PROJECT COSTS IN PROJECT BUDGET THE OSC HAS DETERMINED THAT IT WILL BE NECESSARY TO REQUEST ADDITIONAL FUNDS, SINCE IT IS NOT POSSIBLE TO TRACK INDIRECT COSTS. THE OSC ACCEPTS NO RESPONSIBILITY AS REGARDS THE TRACKING OF INDIRECT COSTS.

D) TOTAL ESTIMATED COSTS FOR DISPOSAL ARE: \$170,000.

ESTIMATED TOTAL COSTS TO DATE ARE: \$260,000.

PROJECT CEILING IS: \$475,000.

II) ACTIONS TAKEN

A) OSC INFORMED ERCS THAT T&D FOR PCB OILS WILL OCCUR ON 8/22.

B) OSC REQUESTED ERCS TO FINALIZE DISPOSAL OF PCB SOLIDS IN AN ATTEMPT TO DO T&D ON 8/22.

III) FUTURE PLANS

A) UPON COMPLETION OF THE ABOVE THE OSC INTENDS TO DECLARE PROJECT CLOSED.

B) OSC WILL VISIT SITE UNANNOUNCED AS TIME PERMITS WHILE PEPCO AND UNITED CONTINUE SITE CLEANUP. ENFORCEMENT AND STATE WILL MONITOR CLEANUP TO ALLOW OSC TO PURSUE OTHER EMERGENCIES.

ROBERT E. CARON
ON-SCENE COORDINATOR
SEPA-III
PHILADELPHIA, PA.

DISCONNECTED 20-Aug-85 08:43 37

SPILLSEPA WSH
POLRE 35

CERCLA IMMEDIATE REMOVAL PROJECT
UNITED RIGGINGS AND HAULING SITE
PRINCE GEORGES COUNTY SITE
BELTSVILLE, MD.

ATTN:TIM FIELDS AND TOM MASSEY

I)SITUATION: (0800 HRS., 9/5/85)

- A) OSC, TAT AND ERCS REMOBILIZED 9/4 TO COMPLETE ALL T&D ON THE EEC TRANSFORMERS. REINSPECTION OF THESE UNITS PRIOR TO TRANSPORT REVEALED APPROX ONE DRUM WORTH OF RESIDUAL OIL IN THSES 27 UNITS. THE OSC DIRECTED ERCS TO COLLECT THIS OIL. THERFOR ONE DRUM WILL REMAIN ONSITE UNTILL DISPOSAL ARRANGEMENTS CAN BE MADE.
- B) THIS ACTION MINUS THE ONE DRUM WILL COMPLETE ANY AND ALL OF EPA ACTIVITY AND FUND EXPENDITURE.
- C) ESTIMATED COSTS TO DATE ARE \$450,000. PROJECT CEILING \$475,000.
- D) DURING THE WEEK OF 8/30 AN INSPECTOR GENERAL REPORTED TO BE FROM EPA HQ APPEARED ONSITE. THE OSC AND ERCS WERE NOT PRESENT AS THE SITE HAD BEEN DEMBILIZED. HOWEVER, PEPCO WAS ON SCENE PERFORMING THEIR CLEANUP UNDER THE CONSENT ORDER. THE OSC INTERVIEWED ONSITE INDIVIDUALS WHO TALKED TO THE AUDITOR. THE OSC WAS TOLD THAT THE INDIVIDUAL SHOWED CREDENTIALS AND DEMANDED TO SEE SITE FILES . THE PEPCO PROJECT MANAGER REFUSED FILE ACCESS AND EXPLAINED TO THE AUDITOR THAT THIS CLEANUP WAS BEING PERFORMED UNDER AN ORDER AND DID NOT INVOLVE SUPERFUND. UPON LEARNING THIS THE AUDITOR LEFT THE SITE. THE OSC CONTACTED REGIONAL SUPERFUND AUDIT COORDINATOR, JOHN MICHITA, WHO INFORMED THE OSC THAT THIS VISIT WAS CONTRARY TO THE REGIONAL AGREEMENT OF PRENOTIFICATION AND THAT THE DESRIPTION OF THE INDIVIDUALS ATTITUDE SHOULD BE DISCUSSED WITH AUDIT MANAGEMENT. JOHN MICHITA DISCUSSED THIS SITUATION WITH REGIONAL AUDIT WHO WERE UNAWRE OF ANY PLANNED SITE VISIT. THEY WILL INVESTIGATE.
- E) OSC REVIEWED PEPCO AND UNITED PROGRESS ON CLEANUP AND IS OVERALL SATISFIED WITH PROGRESS.
- F) OSC INFORMED ON 9/4 THAT THE RESULTS FROM THE DIOXIN SAMPLING ARE NOW AVAILABLE AND ALTHOUGH NO 2,3,7,8 WAS FOUND THERE IS A SIGNIFICANT LEVEL(1500PPB) OF DIBENZOFURANS. THE OSC INFORMED CDC WHO REQUEST DATA PRIOR TO MAKING COMMENT. OSC ADVISED REGIONAL COUNSEL AND REGIONAL MANAGEMENT. OSC REQUESTED WALT LEE, REGIONAL DIOXIN COORDINATOR TO PROVIDE WRITTEN REVIEW AND ADVICE. NO ADVICE WILL BE FORTHCOMING FROM REGIONAL DIOXIN PEOPLE AS GUIDANCE IS UNCLEAR ON THIS SUBJECT AND IS RELATED TO CDC OPNION. OSC REQUESTS ADVICE AND GUIDANCE.

II)ACTIONS TAKEN

- A) OSC COMPLETED ALL T&D FOR EEC TRANSFORMER CARCASSES AND PCB SOLIDS. ALL MATERIAL SENT TO CHEMWASTE IN MODEL CITY NEW YORK.
- B) OSC INSPECTED SITE FOR ORDER COMPLIANCE. APPEARS O.K.

III)FUTURE PLANS

- A) ONE DRUM REMAINING TO BE HANDLED THRU TSD ROUTE ASAP.
- B) ENFORCEMENT TO CONTNUE MONITORING ORDER COMPLIANCE.
- C) OSC AWAITS GUIDANCE FROM CDC,REGION AND HQ AS REGARDS DIBENZOFURAN ISSUE.

ROBERT E. CARON
ON-SCENE COORDINATOR
USEPA-III
PHILADELPHIA,PA.

TLX II 7108229269
CONNECTED 11-Sep-85 09:27 02

SPILLSEPA WSH
POLREP 36

CERCLA ENFORCEMENT LEAD SITE
UNITED RIGGINGS AND HAULING
PRINCE GEORGES COUNTY
BELTSVILLE, MD.

ATTN;TIM FIELDS AND TOM MASSEY

I)SITUATION: (0800 HRS., 9/11/85)

- A) OSC CONSIDERS ALL FUND FINANCED ACTIVITIES COMPLETE. AWAITING FINAL INVOICING FROM ERCS.
- B) OSC WAS INFORMED BY CERCLA ENFORCEMENT DIOXIN COORDINATOR, WALT LEE THAT PRELIMINARY UNVERIFIED RESULTS FROM DIOXIN SCREENING PERFORMED IN JUNE INDICATE THE PRESENCE OF BOTH DIOXIN AND DIBENZOFURANS AT SIGNIFICANT LEVELS RANGING FROM 1.6 PPB TO 1500 PPB. PREVIOUSLY FAST TURNAROUND ANALYSIS FOR 2,3,7,8 ONLY WERE NEGATIVE ENABLING AN ORDER TO BE DEVELOPED WHICH DOES NOT INCLUDE DIOXINS. IN ADDITION PEPCO IS ACTIVELY PERFORMING WORK UNDER THIS ORDER AND HAS ALREADY DISPOSED OF OVER 150 TRUCK LOADS OF CONTAMINATED SOILS.
- C) OSC CONSULTED WITH CDC WHO UNOFFICIALLY INDICATED THAT NO INCREASED HEALTH IMPACT WOULD BE EXPECTED OVER THAT OF THE ALREADY CERTIFIED PCB PROBLEM.
- D) OSC HAS CONSULTED WITH REGIONAL DIOXIN PERSONNEL AND HQ DIOXIN PERSONNEL WHO HAVE OFFERED NO CONSTRUCTIVE GUIDANCE TO DATE.
- E) OSC ACTIVELY SEEKING ADVICE AND GUIDANCE AS TO THIS SITUATION AND ESPECIALLY LEGAL GUIDANCE AS TO THE STATUS OF THE ORDER. SHOULD THE OSC UTILIZE AUTHORITIES UNDER THE ORDER TO STOP WORK ONSCENE BECAUSE OF THE PRESENCE OF DIOXIN? WHAT STEPS ARE APPROPRIATE IF THE OSC DOES STOP WORK?
- F) THE OSC STILL CONSIDERS THIS SITE TO BE ENFORCEMENT LEAD AND WILL REQUIRE A POSITION FROM ENFORCEMENT AS REGARDS THIS ISSUE PRIOR TO TAKING ANY ACTION.
- G) THE OSC FORMALLY REQUESTS GUIDANCE FROM BOTH THE REGION AND HQ AS REGARDS THIS ISSUE.
- H) THE OSC CONSIDERS THIS INFO CRITICAL AND AFTER CERTIFIED QA/QC WILL STRONGLY RECOMMEND RELEASE OF THIS DATA TO ALL PARTIES CONCERNED.

ROBERT E. CARON
ON-SCENE COORDINATOR
USEPA-III
PHILADELPHIA, PA.

TLX II 7108229269
CONNECTED 12-Sep-85 15:14 19

SPILLSEPA WSH
POLREP 37

CERCLA ENFORCEMENT LEAD SITE
UNITED RIGGINGS AND HAULING
PRINCE GEORGES COUNTY
BELTSVILLE, MD.

ATTN: TIM FIELDS AND TOM MASSEY

I) SITUATION: (1400 HRS., 9/12/85)

- A) QA/QC OFFICER, PAT KRANTZ, AFTER REVIEW OF THE DIOXIN AND DIBENZOFURAN LABORATORY RESULTS HAS CONCLUDED THAT THE SECOND 2,3,7,8 DIOXIN LABORATORY RESULT IS ERONEOUS AND THAT THE FIRST RESULT REPORTED IN JULY AS NON DETECTABLE IS THE EPA ACCEPTED RESULT. THIS IS DUE TO THE FACT THAT THE LAB WAS USING AN "EXPERIMENTAL" METHOD WHICH IS PRESENTLY IN TRIAL BY THESE LABS. THE RESULTS FOR THE SPIKES AND SURROGATES WERE INCONCLUSIVE. THE RESULTS FOR THE DIBENZOFURANS WERE VERIFIED AND ARE ACCEPTED.
- B) THE OSC HAS CONSULTED WITH REGIONAL COUNSEL AS REGARDS THIS ISSUE AND IT'S POSSIBLE IMPACT AS REGARDS THE CONSENT ORDER. SINCE DIBENZOFURANS ARE NOT REGULATED BY ANY FEDERAL LAW THEN THIS WASTE IS STILL A TSCA WASTE. SINCE TSCA PERMITTED LANDFILLS DO NOT REQUIRE DIBENZOFURAN ANALYSIS THEN THIS MATERIAL IS ALLOWABLE UNDER EPA REGULATIONS FOR DISPOSAL AT THE CHEM WASTE LANDFILL IN N.Y.
- C) THE OSC WILL PROVIDE COPIES OF THIS ANALYSIS TO PEPCO, UNITED RIGGINGS AND THE STATE OF MARYLAND RECOMMENDING THAT PEPCO INFORM CHEM WASTE OF THESE RESULTS TO ASSURE THAT BOTH THE LANDFILL AND THE STATE OF N.Y. HAVE NO PROBLEM WITH THIS WASTE GOING THERE.
- D) THE OSC AGAIN ASKS FOR ADVICE AND GUIDANCE AS REGARDS THESE ISSUES.
- E) THE OSC HAS REQUESTED THAT ENFORCEMENT DETERMINE THAT THERE IS A NEED FOR CORRECTIVE ACTION UNDER THE ORDER AS REGARDS THESE ISSUES, AND THAT THERE IS A NEED FOR OSC INVOLVEMENT.

ROBERT E. CARON
ON-SCENE COORDINATOR
USEPA-III
PHILADELPHIA, PA.

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SPILLSEPA WSH
POLREP 39

CERCLA ENFORCEMENT LEAD SITE
UNITED RIGGING AND HAULING
BELTSVILLE, MD.

ATTN: TIM FIELDS AND TOM MASSEY

1) SITUATION: (0900 HRS., 11/29/85)

A) OSC CONTACTED BY ENFORCEMENT, ROBIN AITKEN, AND INFORMED THAT THE CONSENT ORDER CLEANUP BEING CONDUCTED BY PEPSCO IS ESSENTIALLY COMPLETE.

B) OSC HAS BEEN CONSULTED THROUGHOUT AS REGARDS INTERPRETATION OF CLEANUP CRITERIA AS SPECIFIED IN THE ORDER. ALL SUCH INTERPRETATION WAS COORDINATED WITH THE STATE OF MARYLAND, REGIONAL COUNSEL AND REGIONAL MANAGEMENT.

C) PEPSCO CLEANUP EXPECTED TO BE COMPLETE BY COB 12/5/85.

D) PEPSCO WILL BE GIVEN 30 DAYS TO PREPARE AND SUBMIT TO THE OSC AND THE STATE A REPORT DETAILING CLEANUP ACTIVITIES AND INCLUDING SAMPLING AND ANALYTICAL RESULTS.

E) OSC COORDINATING A SITE INSPECTION WITH ENFORCEMENT, PEPSCO, STATE, AND UNITED RIGGING FOR 12/3/85, TO REVIEW CONTROL AND STABILIZATION AND CLEANUP EFFORTS AND ASSURE PROPER SITE RESTORATION AND COMPLIANCE WITH THE ORDER.

F) THE STATE OF MARYLAND WILL CONTINUE TO PURSUE BURIED DRUM, TRANSFORMER ISSUES BY COLLECTING SAMPLES ALONG BANK FACES AND VIA DRILL CUTTINGS. STATE TO PERFORM THIS WORK WEEK OF 12/2.

G) THE OSC CONCURS WITH THE STATE THAT NO CLOSEOUT OF ORDER SHOULD BE ALLOWED UNTIL PROPER REVIEW OF PEPSCO CLEANUP DATA IS COMPLETE. OSC AND STATE WILL COMPLETE THIS REVIEW WITHIN 10 DAYS UPON RECEIPT.

H) UPON COMPLETION OF REVIEW AND SATISFACTORY SITE INSPECTION, THE OSC AND THE STATE OSC WILL CERTIFY AS TO COMPLIANCE WITH THE ORDER THEREBY ALLOWING FOR ORDER CLOSEOUT.

ROBERT E. CARON
ON-SCENE COORDINATOR
USEPA-III
PHILADELPHIA, PA.

SPILLSEPA WSH

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POLREP 3738

CERCLA ENFORCEMENT LEAD SITE
UNITED RIGGING AND HAULING SITE
PRINCE GEORGES COUNTY
BELTSVILLE, MD.

ATTN:TIM FIELDS AND TOM MASSEY

I)SITUATION: (1300 ., 9/13/85)

A) AS STATED BEFORE, THE OSC NOW CONSIDERS THIS SITE TO BE AN
ENFORCEMENT LEAD. ALL FUND FINANCED ACTIVITIES ARE COMPLETE.
THE OSC WILL REQUIRE ENFORCEMENT REQUEST BEFORE ANY ACTION USING
OSC AUTHORITIES ARE CONTEMPLATED AS REGARDS THE NOW IN PLACE CONSENT
ORDER.

ROBERT E. CARON
ON-SCENE COORDINATOR
USEPA-III
PHILADELPHIA, PA.

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SPILLSEPA WSH
POLREP 39

CERCLA ENFORCEMENT LEAD SITE
UNITED RIGGING AND HAULING
BELTSVILLE, MD.

ATTN: TIM FIELDS AND TOM MASSEY

1) SITUATION: (0900 HRS., 11/29/85)

A) OSC CONTACTED BY ENFORCEMENT, ROBIN AITKEN, AND INFORMED THAT THE CONSENT ORDER CLEANUP BEING CONDUCTED BY PEPCO IS ESSENTIALLY COMPLETE.

B) OSC HAS BEEN CONSULTED THROUGHOUT AS REGARDS INTERPRETATION OF CLEANUP CRITERIA AS SPECIFIED IN THE ORDER. ALL SUCH INTERPRETATION WAS COORDINATED WITH THE STATE OF MARYLAND, REGIONAL COUNSEL AND REGIONAL MANAGEMENT.

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ROBERT E. CARON
ON-SCENE COORDINATOR
USEPA-III
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